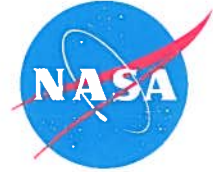


National Aeronautics and Space Administration

Goddard Space Flight Center
Greenbelt, MD 20771



September 30, 2011

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Refreshments at the Supply Chain 2011 Conference (5th Annual NASA Supply Chain Quality Assurance Conference) and Attendance at the Space Industry Supplier Social

From October 18 to 20, 2010, NASA will hold the Supply Chain 2011 Conference (5th Annual NASA Supply Chain Quality Assurance Conference) at GSFC. Mantech International Corporation, Honeywell Technology Solutions, Inc. and Millennium Engineering and Integration Company have offered to sponsor refreshments for attendees during the conference. In addition, these same firms are sponsoring the Space Industry Supplier Social on the evening of October 18, 2011. Ball Aerospace has offered to sponsor refreshments at one seminar on October 20, 2011. All events will be held at the Goddard Space Flight Center.

Approximately 275 people are expected to attend the events, representing NASA, other Federal agencies, industry, and academia. The estimated cost per person is \$40. The conference will focus on managing risks to assure mission success, and include presentations on innovations in assuring mission success, risk management, and a strategic process management seminar. The guest speakers will include NASA Chief Engineer, Michael Ryschkewitsch.

Attendance at the conference and social will allow NASA employees an opportunity to discuss innovation and mission success as it relates to the NASA supply chain with the other attendees. I therefore conclude that NASA's interest in its employees attending these events outweighs any concern that attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

Based on the above, I find that the events meet the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). Accordingly, NASA employees whose duties do not substantially affect the sponsors identified above may accept free attendance to and/or refreshments at the events for themselves and their guests. NASA employees whose duties substantially affect Mantech International Corporation or any of the other sponsors noted above, for instance by way of procurement duties, should seek an individual determination regarding participation in these events from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Robert M. Stephens".
Robert M. Stephens